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June 19, 2020

VIA ECF

The Honorable Debra Freeman
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Re: *Jane Doe v. Darren K. Indyke and Richard D. Kahn, in their capacities as executors of the Estate of Jefferey E. Epstein, and Ghislaine Maxwell, No. 1:20-cv-00484-JGK-DCF*

Dear Judge Freeman:

We represent Defendants Darren K. Indyke and Richard D. Kahn, as Co-Executors of the Estate of Jefferey E. Epstein (the “Co-Executors”), in the above-referenced action. Together with counsel for Plaintiff and pursuant to this Court’s Order dated April 1, 2020 (ECF Doc. 35), we submit this joint status report regarding discovery and settlement discussions.

I. Discovery

On April 20, 2020, the parties served their initial interrogatories and requests for production on each other. The parties served their responses and objections on June 3, 2020. The parties are working to set deposition dates, with Darren Indyke’s deposition already scheduled for August 7, 2020. The parties are also corresponding to resolve any discovery disputes.

II. Settlement Discussions

As the Co-Executors recently advised the Court in another action, the Epstein Victims’ Compensation Program (“Program”) has been established, with formal claims accepted for the Program Administrator’s review starting on June 25, 2020. The Co-Executors encourage Plaintiff to consider participating in the Program. Plaintiff is currently considering whether or not she will be participating in the Program.

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Respectfully submitted,

s/Bennet J. Moskowitz
Bennet J. Moskowitz